Saskatchewan Telecommunications is <u>compliant</u> with all sections pertaining to Customer Proprietary Network Information. Saskatchewan Telecommunications provides comments and specific company process references below in the appropriate sections of the regulations.

Subpart U—Customer Proprietary Network Information

Source: 63 FR 20338, Apr. 24, 1998, unless otherwise noted.

64.2005   Use of customer proprietary network information without customer approval.

> <u>Saskatchewan Telecommunications comment:</u> Saskatchewan Telecommunications currently does not allow third party or affiliate access to United States customer proprietary network information (CPNI) data.

64.2007   Approval required for use of customer proprietary network information.

> <u>Saskatchewan Telecommunications comment:</u> Saskatchewan Telecommunications currently does not allow third party or affiliate access to United States customer proprietary network information (CPNI) data.
> Future changes to the management of CPNI data within Saskatchewan Telecommunications are required to be reviewed by Regulatory Affairs with subsequent notice to the Commission of revised procedures to ensure continued compliance.

64.2008   Notice required for use of customer proprietary network information.

> <u>Saskatchewan Telecommunications comment:</u> Saskatchewan Telecommunications currently does not allow third party or affiliate access to United States customer proprietary network information (CPNI) data.
> Future changes to the management of CPNI data within Saskatchewan Telecommunications are required to be reviewed by Regulatory Affairs with subsequent notice to the Commission of revised procedures to ensure continued compliance.

64.2009   Safeguards required for use of customer proprietary network information.

> <u>Saskatchewan Telecommunications comment:</u> Saskatchewan Telecommunications currently does not allow third party or affiliate access to United States customer proprietary network information (CPNI) data. Saskatchewan Telecommunications has established data classification procedures to maintain appropriate data security. Saskatchewan Telecommunications maintains strict privacy policies to protect all customer data. These policies and procedures are administered by the Chief Privacy Officer. All new and existing employees are required to complete mandatory privacy and security courses specifically reviewing the confidentiality of customer information. Corporate confidentiality policies include disciplinary procedures with sanctions up to and including firing in the event of confidentiality and/or privacy breeches.

64.2010 Safeguards on the disclosure of customer proprietary network information.

Saskatchewan Telecommunications comment: Saskatchewan Telecommunications currently serves United States business customers with account representatives maintaining customer lists. Saskatchewan Telecommunications maintains business customer confidentiality through contractual agreements. Saskatchewan Telecommunications does not permit on line or in store access to CPNI information.

64.2011 Notification of customer proprietary network information security breaches.

Saskatchewan Telecommunications comment: In the event of a breach affecting United States customer data, specific processes are as follows:

- Technology Solutions Manager to notify Chief Privacy Officer of privacy breach
- if USA customer data is identified as compromised, notify SaskTel Security
- SaskTel Security will initiate reporting via the FBI website (https://www.cpnireporting.gov/dtrp/content/disclaimer.faces) within the directed time frames.
- Saskatchewan Telecommunications, within the directed timeframes, will subsequently notify the affected end customers after notification to United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI), or when authorized by FBI where such authorization is legally required.
- Record keeping shall be maintained at a minimum in accordance with the directed timeframes.